

Barber Foods)	Departmental
Cumberland County)	Findings of Fact and Order
Portland, Maine)	Air Emission License
A-569-71-G-M)	Amendment #2

After review of the air emissions license minor revision application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

1. Barber Foods (Barber) was issued Air Emission License A-569-71-E-A/R on April 1, 1999, permitting the operation of emission sources associated with their frying lines and ovens, located in Portland, Maine. The license was subsequently amended on August 29, 2001 (A-569-71-F-M).
2. Barber has requested an amendment to their license for a temporary boiler to provide hot water for cleaning and sanitation.

B. Fuel Burning Equipment

Barber is authorized to operate the following air emission units:

Revised Fuel Burning Equipment List

<u>Equipment</u>	<u>Type of Equipment</u>	<u>Date of Construction</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Fuel Type, %Sulfur</u>	<u>Maximum Firing Rate (i.e. gal/hr)</u>	<u>Stack #</u>
Unit #1	Boiler	1991	5.23	Natural Gas	4980 scf/hr	1
Unit #2	Boiler	1991	5.23	Natural Gas	4980 scf/hr	1
Unit #6	Fryer #1	1987	2.3	Natural Gas	2190 scf/hr	6 A,B
Unit #7	Fryer #3	1991	2.3	Natural Gas	2190 scf/hr	7 A,B
Unit #9	Oven	1991	2.2	Natural Gas	2095 scf/hr	9A,B,C
Unit #22	Boiler	1987	1.42	#2, 0.5%	10.0 gal/hr	22
Unit #23	Fryer #2	1996	2.4	Natural Gas	3000 scf/hr	23A&B
Temporary Boiler	Boiler	2002	4.2	#2, 0.35%	30.0 gal/hr	2T

Bold denotes new equipment.

C. Application Classification

The application for Barber includes the installation of new equipment. However, the increase in emissions from the facility will be less than 4.0 tons for a single pollutant and less than 8.0 for total regulated pollutants. Therefore, the license is considered to be a minor revision and has been processed as such.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in Chapter 100 of the Air Regulations. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new equipment and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in Chapter 100 of the Air Regulations. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. New Temporary Boiler

The Temporary Boiler has a heat input capacity of 4.2 MMBtu/hr and fires #2 fuel oil with a maximum sulfur content of 0.35% by weight and is therefore not subject to New Source Performance Standards (NSPS) Subpart Dc. BACT for the Temporary Boiler is the following:

1. Emission rates for PM are based on BACT of 0.05 lb/MMBtu.
2. Use of 0.35% sulfur #2 fuel oil.
3. SO₂ emission data was based on fuel sulfur mass balance.
4. NO_x, CO and VOC emission data was based on manufacturer data.
5. Visible emissions from the stack serving the temporary boiler shall not exceed an opacity of 20 percent on a six (6) minute block average basis, except for no more than one (1) six (6) minute block averages in a 3-hour period.

C. Revised Annual Emission

Barber Foods has the following annual emissions, based on a 12 month rolling total firing no more than:

- 90,000,000 cubic feet of natural gas facility wide.
- 50,000 gallons of 0.5% sulfur #2 fuel oil in Boiler #22
- 50,000 gallons of 0.35% sulfur #2 fuel oil in the Temporary Boiler

Total Allowable Annual Emissions for the Facility
(used to calculate the annual license fee)

<u>Pollutant</u>	<u>Tons/yr</u>
PM	14.1
PM ₁₀	14.1
SO ₂	3.0
NO _x	5.8
CO	4.1
VOC	3.0

ORDER

The Department hereby grants Air Emission License Amendment A-569-71-G-M, subject to the conditions found in Air Emission License A-569-71-E-A/R, amendment A-569-71-F-M and in addition to the following conditions:

The following condition shall replace Condition (23) of Air Emission License A-569-71-E-A/R

(23) Fuel use (based on a 12 month rolling total) shall be limited to:

- 90,000,000 cubic feet of natural gas facility wide;
- 50,000 gallons of #2 fuel oil (0.5% sulfur by weight maximum) in Boiler #22;
- 50,000 gallons of #2 fuel oil (0.35% sulfur by weight maximum) in the Temporary Boiler.

Compliance with the fuel use limits shall be demonstrated by receipts from the supplier documenting the quantity of fuel delivered (maintained on a 12-month rolling total). The records for the #2 fuel oil shall include fuel percent sulfur as documented by receipts.

**BARBER FOODS
CUMBERLAND COUNTY
PORTLAND, MAINE
A-569-71-G-M**

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**Departmental
Findings of Fact and Order
Air Emission License
Amendment #2**

The following is a new condition to Air Emission License A-569-71-E-A/R

(28) Temporary Boiler

A. Emissions from the Temporary Boiler shall not exceed the following:

<u>Pollutant</u>	<u>lb/hr</u>
PM	0.21
PM ₁₀	0.21
SO ₂	1.48
NO _x	1.05
CO	0.30
VOC	0.11

B. Visible Emissions

Opacity shall not exceed 20 percent on a six (6) minute block average basis, except for no more than one (1) six minute block average in a 3-hour period.

C. The Temporary Boiler shall be replaced by a permanent boiler by **March 1, 2004**.

(29) Barber shall pay the annual air emission license fee within 30 days of **September 30th** of each year. Pursuant to 38 MRSA §353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for revocation of the license under 38 MRSA §341-D, subsection 3.

(30) This amendment shall expire concurrently with Air Emission License A-569-71-E-A/R.

DONE AND DATED IN AUGUSTA, MAINE THIS _____ DAY OF _____ 2003.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAWN R. GALLAGHER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: July 28, 2003

Date of application acceptance: July 30, 2003

Date filed with the Board of Environmental Protection: _____

This Order prepared by Mark E. Roberts, Bureau of Air Quality.